

IN RE: GORDON LEE DEFREESE, JR. and : CHAPTER 13
LARISSA IRIS DEFREESE :
Debtors :
 :
JACK N. ZAHAROPOULOS :
STANDING CHAPTER 13 TRUSTEE :
Movant :
 :
vs. :
 :
GORDON LEE DEFREESE, JR. and :
LARISSA IRIS DEFREESE :
Respondents : CASE NO. 5-23-bk-02855

AND NOW, this 12th day of February, 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtors' plan for the following reason(s):

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6. The Trustee provides notice to the Court as to the ineffectiveness of debtors' Chapter 13 Plan for the following reasons:

- a. The attorney fees requested in the plan and 2016(b) Statement exceeds the presumed reasonable fee. A Fee Application should be filed in this case if counsel fees exceed \$4,500.00. The debtors owned Flash Hauling, LLC, which ceased operations in September, 2023.

WHEREFORE, Trustee alleges and avers that debtors' plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 21st day of February, 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Michael Cibik, Esquire
1500 Walnut Street, Suite 900
Philadelphia, PA 19102

/s/Deborah A. DePalma
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee